

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D. C.**

In the Matter of)	
)	
Number Resource Optimization)	
)	
)	
SBC IP Communications, Inc. Petition for)	CC Docket No. 99-200
Limited Waiver of Section 52.15(g)(2)(i) of)	
the Commission's Rules Regarding Access to)	
Numbering Resources)	
)	

**Reply Comments of the Public Service
Commission of the State of Missouri**

On July 7, 2004, SBC IP Communications, Inc. (SBCIP) filed a petition with the Federal Communications Commission (FCC) requesting a limited waiver of the federal numbering rules to allow it to obtain numbering resources directly from the North American Numbering Plan Administrator (NANPA) and/or the Pooling Administrator (PA). On August 16, 2004, interested parties filed comments on the Petition. The Public Service Commission of the State of Missouri ("MoPSC"), without taking a position on the petition, offers the following reply comments addressing concerns raised in comments filed on the petition.

In its petition, SBCIP states, "VoIP providers, however, are information service providers, which, as discussed below, are not eligible for direct assignment of NANP telephone numbers under the Commission's existing rules." Therefore, SBCIP requests a limited waiver of the Commission's rules so that it can obtain numbering resources directly from NANPA and use these numbering resources to deploy IP-enabled services,

including Voice over Internet Protocol (VoIP) services, on a commercial basis to residential and business customers. SBCIP indicated in its petition that it will fully comply with all existing Commission numbering resource requirements, including: compliance with thousand-block number pooling requirements; number resource utilization/forecast reporting requirements; local number portability requirements and contribution to numbering administration costs. The MoPSC diligently monitors numbering resources in Missouri under the authority delegated to it by the FCC. Therefore, the MoPSC recommends that any waiver of the Commission's rules that allows SBCIP or other providers to obtain numbering resources directly from NANPA be conditioned on the requirement that those providers will be expected to comply with all numbering resource requirements, including those delegated to state commissions. As the Public Utility Commission of Ohio recommends in its comments, "These companies should recognize the significant role that state commissions perform regarding numbering issues and should be required to be responsive to state commission concerns and inquiries regarding the utilization and conservation of numbers and local number portability." Such a requirement will allow state commissions to apply number conservation efforts to all numbers received directly from NANPA.

Respectfully submitted,

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